

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

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In re:	:	Chapter 11
	:	
GMS Sunset LLC	:	No. 25-11181
	:	
Debtor.	:	
	:	
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**NOTICE AND APPLICATION FOR ORDER AUTHORIZING THE
EMPLOYMENT OF CHUNG & PRESS, P.C. AS COUNSEL
FOR THE DEBTOR AND DEBTOR-IN-POSSESSION**

PLEASE TAKE NOTICE that the above referenced Debtor has filed an application to employ Chung & Press P.C. as counsel to the Debtor. You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.) If you do not wish the court to grant the relief sought in the application, or if you want the court to consider your views thereon, then on or before fourteen days after service hereof, you or your attorney must file with the court a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the application as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the 14th day after service. You must mail a copy to the persons listed below. A hearing will be scheduled if a timely objection is filed. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

GMS Sunset LLC, debtor and debtor-in-possession (the "Debtor"), submits this application (the "Application") pursuant to section 327(a) of title 11 of the United States Code (the "Bankruptcy Code") and Federal Rule of Bankruptcy Procedure (the "Bankruptcy Rules") 2014(a) for an order authorizing the Debtor to employ and retain the firm of Chung & Press, P.C. ("Chung & Press") as its attorneys in this chapter 11

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case. In support of this Application, the Debtor respectfully represents to this Honorable Court as follows:

1. On June 11, 2025, this case was commenced by the filing of a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Court”).

2. The Debtor has continued and intends to continue in the possession of its property as debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

3. The Debtor is an LLC that owns a commercial condominium in Fairfax County, leased to a related party for operation of a bakery. This is a single asset real estate case.

4. The Debtor desires to retain and employ Chung & Press pursuant to section 327(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a) to perform all legal services in these proceedings as more fully set forth below.

5. In order to enable the Debtor to perform its duties as debtor-in-possession and to effect the proper and expeditious administration of this case, Chung & Press will be required to render legal services to the Debtor in connection with this proceeding, including, but not limited to, the following:

a) Assisting and advising the Debtor relative to the administration of this proceeding;

b) Representing the Debtor before the Bankruptcy Court and advising the Debtor on all pending litigations, hearings, motions, and of the decisions of the Bankruptcy Court;

c) Reviewing and analyzing all applications, orders, and motions filed with the Bankruptcy Court by third parties in this proceeding and advising the Debtor thereon;

d) Attending all meetings conducted pursuant to section 341(a) of the Bankruptcy Code and representing the Debtor at all examinations;

e) Communicating with creditors and all other parties in interest;

f) Assisting the Debtor in preparing all necessary applications, motions, orders, supporting positions taken by the Debtor, and preparing witnesses and reviewing documents in this regard;

g) Conferring with all other professionals, including any accountants and consultants retained by the Debtor and by any other party in interest;

h) Assisting the Debtor in negotiations with creditors or third parties concerning the terms of any proposed plan of reorganization;

i) Preparing, drafting and prosecuting the plan of reorganization and disclosure statement; and

j) Assisting the Debtor in performing such other services as may be in the interest of the Debtor and the Estate and performing all other legal services required by the Debtor.

6. The Debtor believes that Chung & Press is well-qualified to be counsel to the Debtor, having ample experience in bankruptcy and insolvency matters. Chung & Press's attorneys have had considerable experience in matters of this nature and are capable of rendering the services required.

7. As set forth in the Affidavit of Daniel M. Press, (the "Affidavit"), annexed

hereto and made a part hereof, Chung & Press represents no interest adverse to the estate regarding the matters upon which it is to be engaged, and is “disinterested” as such term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b).

Chung & Press will not, while retained by the Debtor, represent any other party in interest in connection with this case.

8. The members and associates of Chung & Press do not have any connection with the Debtor (other than as its attorneys in this and prior matters as described in the annexed affidavit), its affiliates, creditors, relatives, or any other party in interest, the United States trustee, or any person employed in the office of the United States trustee, except as set forth in the affidavit filed herewith.

9. The employment of Chung & Press is in the best interests of the Debtor, its creditors and the estate.

10. Chung & Press will charge fees and expenses incurred in representing the Debtor in these proceedings based on the normal rates charged by the attorneys and paralegals of Chung & Press for similar clients, currently \$495/hr. for Daniel M. Press. Such rates are subject to periodic review and change, usually on an annual basis. Chung & Press will seek compensation for services rendered and expenses incurred upon appropriate application to the court pursuant to sections 330 and 331 of the Bankruptcy Code and Bankruptcy Rules.

WHEREFORE, the Debtor requests that it be authorized to retain and employ the law firm of Chung & Press, P.C. as counsel to assist in the performance of its functions as DIP and otherwise with respect to this case pursuant to section 327(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a); and for such other relief as the Court

deems just and proper.

Dated: June 11, 2025.

Respectfully submitted,

/s/ Daniel M. Press

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CERTIFICATE OF SERVICE

This is to certify that on this 11th day of June, 2025, I caused to be served the above he Application to Employ of Chung & Press, P.C., as Counsel to the Debtor on by CM/ECF upon the United States Trustee and by first class mail, postage prepaid, upon all creditors on the attached matrix.

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